MICHAEL A. JACOBS (CA SBN 111664) Macobs@mofo.com ARTURO J. GONZÁLEZ (CA SBN 121490) AGONZÁLEZ (SAN FRANCISCO MACONZÁLEZ (SAN MACONZÁLEZ (SAN FRANCISCO MACONZÁLEZ (SAN				
AGOnzálezé mofo.com MORISON & FOERSTER I.I.P 425 Market Street San Francisco, California 94105-2482 Tel: 415.268.7000 / Fax: 415.268.7522 KAREN L. DUNN (<i>Pro Hac Vice</i>) Kdunnébsflp.com HAMSH P.M. HUME (<i>Pro Hac Vice</i>) hlume@bsflp.com BOIES SCHILLER FLEXNER LLP 1401 New York Avenue, N.W. Washington DC 20005 Tel: 202.237.2777 / Fax: 202.237.6131 WILLIAM CARMODY (<i>Pro Hac Vice</i>) bcarmody @susmangodfrey.com SIHAWN RABIN (<i>Pro Hac Vice</i>) srabin@susmangodfrey.com SUSMAN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023 Tel: 212.336.8330 / Fax: 212.336.8340 44 45 41 41 41 41 42 43 44 45 44 46 47 48 48 48 49 49 40 40 41 40 41 41 41 41 42 41 42 44 45 46 47 48 48 49 49 40 40 41 40 41 41 41 41 42 42 43 44 45 46 47 48 48 49 49 40 40 41 40 41 41 41 41 42 42 43 44 45 46 47 48 48 49 49 40 40 40 41 40 41 41 41 41 41		MJacobs@mofo.com		
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17 UNITED STATES DISTRICT COURT 18 NORTHERN DISTRICT OF CALIFORNIA 19 SAN FRANCISCO DIVISION 20 WAYMO LLC, 21 Plaintiff, 22 v. 23 UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC, 24 Defendants. 26 Defendants. 27 Defendants.		UBER TECHNOLOGIES, INC.		
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Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC ("Defendants") submit this motion for an order to file under seal their Discovery Letter Brief ("Letter"). Specifically, Defendants file under seal the following confidential document in accordance with Paragraph 14.4 of the Protective Order:

Document	Portions to Be Filed Under Seal	Designating Party
Discovery Letter Brief ("Letter")	Highlighted Portions	Plaintiff (Green)

The green-highlighted portions of the Letter contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). (Yang Decl. ¶ 3.)

Defendants do not believe the green-highlighted portions of the Letter merit sealing, but Waymo designated this material "Highly Confidential – Attorneys' Eyes Only." Defendants file this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to Local Rule 79-5. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the document at issue, with accompanying chamber copy.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on December 20, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and designate the service copies of these documents as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."

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1	Dated: December 20, 2017	MORRISON & FOERSTER LLP
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3		By: /s/ Arturo J. Gonzalez ARTURO J. GONZALEZ
4		Attorneys for Defendants
5		Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC
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